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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

<b>IN RE: DA VINCI SURGICAL ROBOT ANTITRUST LITIGATION</b>	<b>Lead Case No. 3:21-CV-03825-VC</b>
<b>THIS DOCUMENT RELATES TO: ALL ACTIONS</b>	<b>TABLE OF EXHIBITS TO PLAINTIFFS' OPPOSITION TO INTUITIVE'S CROSS- MOTION FOR SUMMARY JUDGMENT AND REPLY IN SUPPORT OF PARTIAL SUMMARY JUDGMENT</b>  The Hon. Vince Chhabria Date: June 8, 2023 Time: 1:00 p.m.

DECLARATION	EXHIBIT #	DESCRIPTION
Corrigan Dec. <sup>1</sup>	1	True and correct copy of the Corrected Expert Report of Professor Einer Elhauge, January 10, 2023 (“Elhauge Rep.”).
Corrigan Dec.	3	True and correct copy of the Rebuttal Expert Report of Professor Einer Elhauge, March 3, 2023 (“Elhauge Reply”).
Corrigan Dec.	7	True and correct copy of the Expert Report of Eugene Rubach, December 1, 2022 (“Rubach Rep.”).
Corrigan Dec.	9	True and correct copy of the document bates stamped Intuitive-00595673 - Intuitive Surgical Devices Business Overview, October 29, 1995.
Corrigan Dec.	12	True and correct copy of the document bates stamped Intuitive-00067540 - Sales, Lease, and Service Agreement between Intuitive and Conway Regional Medical Center, Inc., August 15, 2019.
Corrigan Dec.	13	True and correct copy of the Defendant Intuitive Surgical, Inc.'s Answer and Affirmative Defense, Dkt. No. 74, January 18, 2022 (“Intuitive Answer”).
Corrigan Dec.	14	True and correct copy of excerpts of the deposition of Anthony McGrogan, 30(b)(6), June 7, 2021 (“McGrogan 30(b)(6) Dep.”).
Corrigan Dec.	17	True and correct copy of the Expert Report of Loren J. Smith (Amended), February 10, 2023 (“Smith Rep.”).
Corrigan Dec.	18	True and correct copy of the document bates stamped REBOTIX174692 - Historical timeline for initial R&D of Benjamin Biomedical and Rebotix.

<sup>1</sup> “Corrigan Dec.” refers to the Declaration of Jeffrey J. Corrigan in Support of Plaintiffs’ Corrected Motion for Partial Summary Judgment (Dkt. 149-1).

DECLARATION	EXHIBIT #	DESCRIPTION
Corrigan Dec.	22	True and correct copy of the document bates stamped Intuitive-01020015 - Email re: Instrument reprogramming in the US-engineering input needed, May 10, 2018.
Corrigan Dec.	27	True and correct copy of excerpts of the deposition of Glenn Papit, June 2, 2021 ("Papit Dep.").
Corrigan Dec.	29	True and correct copy of the document bates stamped Intuitive-00478439 - Letter from Intuitive to Stephanie L. Parker and Clifton Parker at Restore Robotics LLC., November 15, 2018.
Corrigan Dec.	30	True and correct copy of the document bates stamped Intuitive-00372993 - Letter from Intuitive to Evergreen Healthcare, October 15, 2019.
Corrigan Dec.	31	True and correct copy of the document bates stamped Intuitive-00560955 - Email re: LND - EP cable reliability results, February 12, 2020.
Corrigan Dec.	33	True and correct copy of the document bates stamped Intuitive-00214241 - Email re: Si service and instrument reprocessing, February 13, 2019.
Corrigan Dec.	42	True and correct copy of the document bates stamped Intuitive-00029174 - Email re: FW: 10+ use instruments, September 25, 2018.
Corrigan Dec.	44	True and correct copy of the document bates stamped Intuitive-00552697 - Intuitive Surgical Non-Filing Justification for Product Family: IS4000/IS4200 8mm Bipolar Cautery Instruments, August 18, 2020.
Corrigan Dec.	45	True and correct copy of excerpts of the deposition of Mario Lowe, 30(b)(6), November 3, 2022 ("Lowe 30(b)(6) Dep.").
Corrigan Dec.	47	True and correct copy of the document bates stamped Intuitive-00556188 - Email re: Instrument life extension - Bi-weekly Program update, February 12, 2020.

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Corrigan Dec.	50	True and correct copy of the document bates stamped Restore-00055937 – Spreadsheet: Sales Report from Restore Robotics LLC 2018 and 2019.
Corrigan Dec.	52	True and correct copy of excerpts of the deposition of Judith Schimmel, September 22, 2022 (“Schimmel Dep.”).
Corrigan Dec.	65	True and correct copy of excerpts of the deposition of Chris Gibson, June 22, 2021 (“Gibson Dep.”).
Corrigan Dec.	66	True and correct copy of the document bates stamped Intuitive-02068246 - Managing the Long Tail of da Vinci Si, September 2016.
Corrigan Dec.	77	True and correct copy of the document bates stamped Intuitive-00552993 - Deutsche Bank Research analysis on Intuitive Surgical, January 27, 2020.
Corrigan Dec.	78	True and correct copy of the document bates stamped Intuitive-00566055 - Deutsche Bank Research analysis on Intuitive Surgical, February 20, 2020.
Corrigan Dec.	83	True and correct copy of the document entered into evidence as Claiborne Dep. Ex. 301 - FDA correspondence, November 15, 2022 (“Claiborne Dep. Ex. 301”).
Corrigan Dec.	84	True and correct copy of the Expert Report of Kimberly Trautman (Supplemental), March 1, 2023 (“Trautman Reply”).
Corrigan Dec.	85	True and correct copy of the document bates stamped REBOTIX175839 – Email correspondence between Rebotix and FDA re: Rebotix Repair, LLC re: Document Number CPT2000126, July 22, 2022.
Corrigan Dec.	86	True and correct copy of excerpts of the deposition of Kimberly A. Trautman, March 15, 2023 (“Trautman Dep.”).

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Corrigan Dec.	87	True and correct copy of excerpts of the deposition of Christy Foreman, February 17, 2023 ("Foreman Dep.").
Corrigan Dec.	89	True and correct copy of the FDA, White Paper: Evaluating Whether Activities Are Servicing or Remanufacturing (May 2018) ("FDA White Paper").
Corrigan Dec.	90	True and correct copy of the document bates stamped Intuitive-00552716 - Intuitive Surgical Non-Filing Justification for Product Family: IS4000 8mm Needle Drivers, August 18, 2020
Corrigan Dec.	91	True and correct copy of the document bates stamped Intuitive-00423534 - PowerPoint: Instrument eX: I&A Refurbishment Feasibility Update, January 30, 2017.
Corrigan Dec.	94	True and correct copy of excerpts of the deposition of Ted Claiborne, November 21, 2022 ("Claiborne Dep.").
Spector Dec.	98	True and correct copy of the document bates stamped Intuitive-00481167 - Intuitive letter response to FDA re: 510(k) Premarket Notification (K013416) Intuitive Surgical Endo Wrist Endoscopic Instruments, January 4, 2002.
Spector Dec.	99	True and correct copy of the document bates stamped Intuitive-00967951 - Email re: Instrument Life Extension Update, July 22, 2019.
Spector Dec.	100	True and correct copy of excerpts of the deposition of Disha Peswani, October 6, 2022 ("Peswani Dep.").
Spector Dec.	101	True and correct copy of the document bates stamped Intuitive-00706002 - FDA letter K214095 to Intuitive Surgical requesting additional information re: da Vinci X/Xi (IS4200/IS4000) 8mm Reusable Instruments.
Spector Dec.	102	True and correct copy of the document bates stamped Intuitive-02056740 - Intuitive's Performance Testing - Reliability Response.

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Spector Dec.	103	True and correct copy of excerpts of the deposition of Ricardo Estape, M.D., October 22, 2022 ("Estape Dep.").
Spector Dec.	104	True and correct copy of the excerpt of the deposition of Dr. John Bomalaski October 8, 2021 ("Bomalaski Dep").
Spector Dec.	105	True and correct copy of excerpts of the deposition of Eugene Otto Dickens, M.D., May 27, 2021 ("Dickens Dep.").
Spector Dec.	106	True and correct copy of excerpts of the deposition of David Rosa, May 19, 2021 ("Rosa Dep.").
Spector Dec.	107	True and correct copy of excerpt of the deposition of Eugene Rubach, March 8, 2023 ("Rubach Dep.").
Spector Dec.	108	True and correct copy of the document bates stamped Intuitive-00967614 - PowerPoint: RMA Analysis for possible life extension (2017-18), January 29, 2019.
Spector Dec.	109	True and correct copy of excerpt of the deposition of Grant Duque, November 8, 2022 ("Duque Dep.").
Spector Dec.	110	True and correct copy of excerpts of the deposition of Bob DeSantis, 30(b)(6), May 27, 2021 ("DeSantis 30(b)(6) Dep.").
Spector Dec.	111	True and correct copy of excerpts of the deposition of David Rosa, May 1, 2023 ("Rosa Dep. 2").
Spector Dec.	112	True and correct copy of the document bates stamped Intuitive-01019873 - Email re: reprogrammed instruments and Si portfolio, May 7, 2018.
Spector Dec.	113	True and correct copy of excerpts of the deposition of Ryan Shaw, October 19, 2022 ("Shaw Dep.").
Spector Dec.	114	True and correct copy of the document bates stamped Intuitive-02068245 - Email re: ISI Reurb report.docx, October 17, 2016.
Spector Dec.	115	True and correct copy of the document bates stamped Intuitive-02068686 - Email re: RFID Tag, May 24, 2011.

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Spector Dec.	116	True and correct copy of the Rebuttal Expert Report of T. Kim Parnell, March 1, 2023 ("Parnell Rep.").
Spector Dec.	117	True and correct copy of excerpts of the deposition of Ronald Lee Bair, Jr., May 24, 2021 ("Bair Dep.").
Spector Dec.	118	True and correct copy of the document bates stamped REBOTIX175417 - Letter from FDA to Rebotix Repair, LLC, November 16, 2021.
Spector Dec.	119	True and correct copy of excerpts of the deposition of Stan Hamilton, November 4, 2022 ("Hamilton Dep.").
Spector Dec.	120	True and correct copy of excerpts of the deposition of Margaret "Maggie" Nixon, October 7, 2022 ("Nixon Dep.").
Spector Dec.	121	True and correct copy of excerpts of the deposition of Edward W. Harrich, May 24, 2021 ("Harrich Dep.").
Spector Dec.	122	True and correct copy of excerpts of the deposition of Maxwell Meng, M.D., February 15, 2023 ("Meng Dep.")
Spector Dec.	123	True and correct copy of the document bates stamped Intuitive-00493612 - IS4000 Surgical System Traditional 510(k) Performance Testing - Bench/Reliability/Life.
Spector Dec.	124	True and correct copy of the Expert Report of Christy Foreman, January 18, 2023 ("Foreman Rep.").
Spector Dec.	125	True and correct copy of excerpts of the deposition of Imron Zafar, November 1, 2022 ("Zafar Dep.").
Spector Dec.	126	True and correct copy of excerpts of the deposition of Karen Waninger, October 6, 2022 ("Waninger Dep.").
Spector Dec.	127	True and correct copy of the document bates stamped Intuitive-00359647 - Email re: Instrument Tampering - Customer Communication, February 6, 2019.
Spector Dec.	128	True and correct copy of the document bates stamped Intuitive-00044535 - Intuitive letter to McLaren Greater Lansing, July 29, 2019.

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Spector Dec.	129	True and correct copy of the document bates stamped Intuitive-00048760 - Intuitive letter to White County Medical Center, July 23, 2019.
Spector Dec.	130	True and correct copy of the document bates stamped Intuitive-02072151 - Restore Settlement, January 23, 2023.
Spector Dec.	131	True and correct copy of the document bates stamped Intuitive-02070399 - Rebotix Settlement, November 8, 2022.
Spector Dec.	132	True and correct copy of excerpts of the deposition of Richard Teal, 30(b)(6), November 18, 2022 ("Teal Dep.").
Spector Dec.	133	True and correct copy of excerpts of the deposition of Judith Schimmel, 30(b)(6), November 16, 2022 ("Schimmel 30(b)(6) Dep.").
Spector Dec.	134	True and correct copy of excerpts of the deposition of Jose Gonzalez, 30(b)(6), October 17, 2022 ("Gonzalez 30(b)(6) Dep.").
Spector Dec.	135	True and correct copy of the excerpt of the deposition of John Wagner, October 11, 2022 ("Wagner Dep.").
Spector Dec.	136	True and correct copy of excerpts of the deposition of Greta Valentine Bernier, November 7, 2022 ("Bernier Dep.").
Spector Dec.	137	True and correct copy of excerpts of the deposition of Clifton Earl Parker, October 25, 2022 ("Parker Dep.").
Spector Dec.	138	True and correct copy of excerpts of the deposition of David Fabricant, November 8, 2022 ("Fabricant Dep.").
Spector Dec.	139	True and correct copy of the document bates stamped STRREB00000259 - Email re: Raptor - S Si - DD Report, March 18, 2016.
Spector Dec.	140	True and correct copy of the excerpts of the deposition of Grant Duque, 30(b)(6), November 8, 2022 ("Duque 30(b)(6) Dep.")

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Spector Dec.	141	True and correct copy of the excerpts of the deposition of T. Kim Parnell, Ph.D., March 10, 2023 ("Parnell Dep.").
Spector Dec.	142	True and correct copy of the document bates stamped Intuitive-00625048 - da Vinci S and Si Instrument Addendum for Automated Cleaning Manual.
Spector Dec.	143	True and correct copy of the excerpt of the deposition of Todd Thomas, November 10, 2022 ("Thomas Dep.").
Spector Dec.	144	True and correct copy of the excerpts of the deposition of Sandra Sosa-Guerrero, September 23, 2022 ("Sosa-Guerrero Dep.").
Spector Dec.	145	True and correct copy of the document bates stamped AHS_MGMT-INTUITIVE_0000241 - Intuitive letter to Ardent Health Services, January 17, 2020.
Spector Dec.	146	True and correct copy of the document bates stamped Intuitive-00786911 - PowerPoint: da Vinci Surgery Services Update.
Spector Dec.	147	True and correct copy of the document bates stamped Intuitive-00785382 - Email re: Q317 Strategic Ops Readout Services, August 25, 2017.
Spector Dec.	148	True and correct copy of the document bates stamped AHS_MGMT-INTUITIVE_0000189 - Email re: Power Supply Replacement, January 12, 2020.